1	RENE L. VALLADARES Federal Public Defender State Bar No. 11479 NISHA BROOKS-WHITTINGTON Assistant Federal Public Defender 411 E. Bonneville, Ste. 250	
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4	Las Vegas, Nevada 89101 (702) 388-6577/Phone	
5	(702) 388-6261/Fax	
6	Attorney for Kory Allen Crossman	
7	UNITED STATES DI	STRICT COURT
8	DISTRICT OF NEVADA	
9	DISTRICTOR	NEVADA
10	UNITED STATES OF AMERICA,	Case No. 2:07-cr-145-KJD-PAL-9
11	Plaintiff,	STIPULATION TO EXTEND
12	V.	<u>DEADLINES IN THIS COURT'S</u> <u>AUGUST 18, 2015 ORDER BY</u>
13	KORY ALLEN CROSSMAN,	FORTY- FIVE (45) DAYS
14	Defendant.	(Second Request)
15		
16	The United States of America, by Assistant United States Attorney Elizabeth Olso	
17	White, and Defendant Kory Allen Crossman, by Assistant Federal Public Defender Nisha	
18	Brooks-Whittington, submit the following Joint Stipulation to extend, by forty-five (45) days	
19	all of the deadlines set in this Court's Order dated August 18, 2015. See CR 1482.	
20	The parties agree and stipulate to the following:	
21	1. On November 26, 2008, this Court sentenced Defendant to 140 months	
22	imprisonment on his conviction for drug-related offenses. CR 437.	
23	2. On March 23, 2015, undersigned counsel filed a motion for appointment of	
24	counsel pursuant to 18 U.S.C. § 3006A and Local Rule 44-1 on behalf of Mr. Crossman to	
25	determine whether he may qualify to seek a reduction of his sentence in light of Guidelines	
26	Amendment 782 and 18 U.S.C. § 3582(c)(2). CR 1474.	

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- 3. On April 8, 2015, this Court issued an Order appointing the Federal Public Defender to represent Defendant, and setting deadlines. Specifically, the Court ordered the Probation Office to provide certain documents to the parties within 30 days (i.e., by May 8, 2015) and ordered the Federal Public Defender to file any appropriate motion or stipulation within 120 days (i.e., by August 6, 2015). CR 1475.
- 4. On August 6, 2015, the parties filed a joint stipulation to extend the deadlines in this Court's April 8, 2015 Order by 60 days. CR 1480. On August 18, 2015, the Court granted the stipulation. CR 1482.
- 5. The parties have continued to request Mr. Crossman's disciplinary hearing and progress report records from the Bureau of Prisons and to date they have not been received. Undersigned counsel recently spoke with a Bureau of Prisons' representative regarding Mr. Crossman's records and was informed that the request would be reviewed. Additional time is requested to receive and review those records prior to filing any motions with the Court.
- 6. For the reason stated above, the parties respectfully request that the Court issue an order extending the deadlines in the Court's August 18, 2015 Order, by forty-five (45) days. DATED this 1st day of October, 2015.

Respectfully submitted,

RENE L. VALLADARES Federal Public Defender

/s/ Nisha Brooks-Whittington

NISHA BROOKS-WHITTINGTON Assistant Federal Public Defender

DATED: <u>10/6/2015</u>

DANIEL G. BOGDEN United States Attorney

/s/ Elizabeth O. White

ELIZABETH O. WHITE
Appellate Chief and
Assistant United States Attorney

IT IS SO ORDERED

U.S. DISTRICT JUDGE KENT J. DAWSON

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